

September 2, 2016

Regional Freedom of Information Officer  
United States Environmental Protection Agency  
SNAFC Building  
61 Forsyth Street, SW  
Ninth Floor  
Atlanta, Georgia 30303-8960

Re: International Paper Company  
Riverdale Paper Mill

Dear Regional FOIA Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), and under the related regulations of the United States Environmental Protection Agency ("EPA"), 40 C.F.R. Part 2. We request that you furnish copies of any and all documents in the control or possession of the EPA relating, pertaining, or referring to the mill site currently owned and operated by International Paper Company ("IP") in Selma, Alabama. This paper mill site is located at 601 County Road 78, Selma, Alabama and is referred to herein as the "Riverdale Mill."

This request is not limited to any category of documents and is not limited to documents created by or for the EPA. This request is not limited to a particular time period. **However, please exclude all records produced in response to FOIA Request EPA-R4-2013-003837 (see Response letter, dated April 11, 2013).** This request includes, but is not limited to, the following information:

1. Any and all internal and external correspondence (including e-mail and any other records sent or received) relating to the Riverdale Mill with any person (including other agency employees, the Alabama Department of Environmental Management ("ADEM"), any other state or federal agency, consultants, IP, and any other persons or organizations.
2. Any and all documents evidencing, referring to, or relating to any Riverdale Mill on-site or related off-site surface water and groundwater sampling.
3. Any and all documents evidencing, referring to or relating to any Riverdale Mill on-site or related off-site air sampling.
4. Copies of all analytical and screening results and laboratory analyses from the Riverdale Mill with figures showing sampling locations and laboratory QA/QC data.

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5. Any and all documents evidencing, referring to, or relating to activities conducted at the Riverdale Mill, including the characterization of activities conducted at the Riverdale Mill.
6. Any and all documents evidencing, referring to, or relating to any enforcement action by EPA in relation to the Riverdale Mill.
7. Any and all documents evidencing, referring to or relating to any permits or permit applications in relation to the Riverdale Mill.
8. Any and all documents evidencing, referring to, or relating to any assessment of any potential risk to human health or the environment in relation to the Riverdale Mill.
9. Any and all documents referring, relating, or pertaining to any inspection or investigation of the Riverdale Mill by EPA.
10. Any and all documents evidencing communications – including, but not limited to, correspondence, telephone messages, e-mails, and the like – between EPA and ADEM regarding the Riverdale Mill.
11. Any and all documents evidencing communications – including, but not limited to, correspondence, telephone messages, e-mails, and the like – between EPA and any third parties (i.e., parties other than ADEM or IP) regarding the Riverdale Mill.
12. A copy of work plans or documents according to which any work or contemplated work was or will be performed at the Riverdale Mill.
13. Copies of any independent engineering estimates of costs to perform any environmental remediation contemplated for the Riverdale Mill.
14. Any and all photographs taken at or of the Riverdale Mill.
15. Any and all documents, interview notes, transcripts of interviews, recordings, summaries of interviews, or other such documents or things related to any interviews conducted by EPA regarding the Riverdale Mill and the operations conducted thereon.
16. Any hard copy or electronic correspondence related to the Riverdale Mill not otherwise covered by one of the FOIA requests herein, including but not limited to any other FOIA requests for information about the Riverdale Mill.
17. A copy of any Riverdale Mill-specific health and safety information.

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18. Any and all documents referring to, relating to, or evidencing any operations or operators at the Riverdale Mill.
19. Any and all administrative orders, consent orders, penalty assessments, notices of violation, notices of noncompliance, consent decrees and/or settlement agreements created, entered, entered into, issued, or assessed regarding or in relation to the Riverdale Mill.
20. Copies of any and all depositions taken by the EPA related to or having reference to the Riverdale Mill.
21. Any and all documents naming, referring to, or relating to IP related to the Riverdale Mill.

If you believe that an exemption to disclosure is applicable, please exercise your discretion to allow review and inspection of the documents. If you decide to invoke an exemption to disclosure, please identify the documents subject to the exemption, exemption claimed and the basis for its applicability.

We are willing to pay all reasonable fees incurred in the search for, review of, and copying of the records responsive to this request.

We will look forward to your response within the 20 working days provided by statute and regulation. *See* 5 U.S.C. § 552(a)(6); 40 C.F.R. § 2.104(a). If you have any questions, please contact me at the number listed above.

Thank you in advance for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Scruggs".

Lorie Scruggs

LS/lr

**ATTACHMENT**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

APR 11 2013

Mrs. Lorie Scruggs  
Gibson Dunn & Crutcher LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036

**RE: Freedom of Information Act Request No. EPA-R4-2013-003837**

Dear Mrs. Scruggs:

This letter is in response to your Freedom of Information Act (FOIA) request of February 20, 2013, regarding documents pertaining to International Paper Company "Riverdale Mill" located at 601 County Road 78, in Selma, Alabama.

Please find enclosed documents which are responsive to your request. The cost of providing this information is \$166.14, which you authorized for payment in your request dated February 20, 2013. An itemized invoice covering the charges for processing your request is enclosed. The Fee Schedule and Payment Procedures attached to the invoice explain the interest and handling charges that will be incurred if payment is not received within 30 days. Payments are accepted through debit, credit card, check or money order. If you choose to make payment by debit or credit card, please do so by registering with [www.pay.gov](http://www.pay.gov) and selecting the EPA Miscellaneous Payment Form (SFO 1.1). If you prefer to pay by check or money order, please make it payable to the U.S. Environmental Protection Agency, within 30 days of the date of this response to the following address:

U.S. Environmental Protection Agency  
FOIA and Miscellaneous Payments  
Cincinnati Finance Center  
P.O. Box 979078  
St. Louis, Missouri 63197-9000  
**RE: EPA-R4-2013-003837**

To ensure proper credit for your payment, your check or money order should refer to the FOI number above and should be accompanied by a copy of the enclosed Bill for Collection. Your prompt remittance of the amount indicated will be appreciated.

## INDEX OF NON-EXEMPT DOCUMENTS

Freedom of Information Act (FOIA) Request EPA-R4-2013-003837

Letter dated December 20, 2000, to Ronald W. Gore, ADEM, from R. Douglas Neeley, EPA, re: approval of a bleach plant alternative monitoring parameter – 2 pages

Letter dated December 5, 2000, to Lee Page, EPA, from Ronald W. Gore, ADEM, re: approval of both a bleach plant alternative monitoring procedure and a closed collection and vent system – 1 page

Letter dated November 15, 2000, to Ron Gore, ADEM, from John Smyth, International Paper “IP”, re: Request for Alternative Monitoring Parameter – 4 pages

Letter dated November 15, 2000, to Ron Gore, ADEM, from John Smyth, IP, re: Alternative Closed Collection and Vent System Monitoring Provisions Request – 4 pages

ICIS Facility Report re: IP Printing Papers Division “Riverdale” – 1 page

DMR Summary re: IP Printing Papers Division “Riverdale” – 24 pages

Letter with enclosures dated February 23, 2011, to Ron Gore, ADEM, from Randy P. Boone, IP, re: Annual Compliance Statement for 2010 – 67 pages

Letter with enclosures dated April 21, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: First Quarter 2011 MACT II Monitoring Reports – 30 pages

Letter with enclosures dated April 26, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: First Quarter 2011 Non-MACT Monitoring Reports – 35 pages

Letter with enclosures dated July 4, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: First Half 2011 – Title V Monitoring Reports – 29 pages

Letter with enclosures dated July 4, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: First Half 2011 – MACT I Monitoring Reports – 38 pages

Letter with enclosures dated July 4, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Second Quarter 2011 MACT II Monitoring Reports – 32 pages

Letter with enclosures dated July 20, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Second Quarter 2011 Non-MACT Monitoring Reports – 35 pages

Letter with enclosures dated October 13, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Third Quarter 2011 MACT II Monitoring Reports – 30 pages

Letter with enclosures dated October 21, 2011, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Third Quarter 2011 Non-MACT Monitoring Reports – 35 pages

Letter with enclosures dated January 19, 2012, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Second Half 2011 – MACT I Monitoring Reports – 47 pages

Letter with enclosures dated January 19, 2012, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Fourth Quarter 2011 MACT II Monitoring Reports – 31 pages

Letter with enclosures dated January 23, 2012, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Second Half 2011 – Title V Monitoring Reports – 27 pages

Letter with enclosures dated January 25, 2012, to Ron Gore, ADEM, from Russell V. Harris, IP, re: Fourth Quarter 2011 Non-MACT Monitoring Reports – 34 pages

Letter with enclosures dated February 21, 2012, to Ron Gore, ADEM, from Randy P. Boone, IP, re: Annual Compliance Statement for 2012 – 60 pages

Letter with enclosures dated February 27, 2012, to Ron Gore, ADEM, from Randy P. Boone, IP, re: Annual Compliance Statement for 2010 – 60 pages

Letter with enclosures dated April 18, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: First Quarter 2012 MACT II Monitoring Reports – 30 pages

Letter with enclosures dated April 23, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: First Quarter 2012 Non-MACT Monitoring Reports – 35 pages

Letter with enclosures dated July 12, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: First Half 2012 – MACT I Monitoring Reports – 42 pages

Letter with enclosures dated July 12, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: Second Quarter 2012 MACT II Monitoring Reports – 32 pages

Letter with enclosures dated July 13, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: First Half 2012 – Title V Monitoring Reports – 28 pages

Letter with enclosures dated July 18, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: Second Quarter 2012 Non-MACT Monitoring Reports – 34 pages

Letter with enclosures dated October 17, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: Third Quarter 2012 MACT II Monitoring Reports – 30 pages

Letter with enclosures dated October 24, 2012, to Ron Gore, ADEM, from James E. Bruce, IP, re: Third Quarter 2012 Non-MACT Monitoring Reports – 35 pages

Letter with enclosures dated January 18, 2013, to Ron Gore, ADEM, from James E. Bruce, IP, re: Second Half 2012 – Title V Monitoring Reports – 26 pages

Letter with enclosures dated January 14, 2013, to Ron Gore, ADEM, from James E. Bruce, IP, re: Second Half 2012 – MACT I Monitoring Reports – 29 pages

Letter with enclosures dated January 14, 2013, to Ron Gore, ADEM, from James E. Bruce, IP, re: Fourth Quarter 2012 MACT II Monitoring Reports – 29 pages

Letter with enclosures dated January 23, 2013, to Ron Gore, ADEM, from James E. Bruce, IP, re:  
Fourth Quarter 2012 Non-MACT Monitoring Reports – 34 pages